

LINCOLNVILLE NETWORKS, INC.
OXFORD TELEPHONE COMPANY
OXFORD WEST TELEPHONE COMPANY
TIDEWATER TELECOM, INC.

EX PARTE COMMENTS

Be Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

October 27, 2008

Re: *In the Matter of Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92, In the Matter of Petition of AT&T for Interim Declaratory Ruling and Limited Waivers Regarding Access Charges and the ESP Exemption, CC Docket No. 08-152, In the Matter of IP-Enabled Services, WC Docket No. 04-36, In the Matter of Universal Service Contribution Methodology, WC Docket No. 06-122, In the Matter of Petition for Declaratory Ruling Filed by CTIA, WT Docket No. 05-194 In the Matter of Jurisdictional Separations & Referral to the Federal-State Joint Board, CC Docket No. 80-286*

Dear Secretary Dortch:

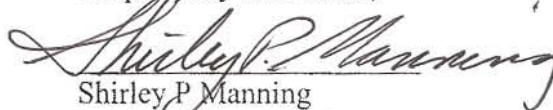
Lincolnvill Networks, Inc., Oxford Telephone Company, Oxford West Telephone Company, and Tidewater Telecom, Inc. (the "Companies") are incumbent local exchange carriers (ILECs) in Maine. The Companies are writing in support of the position taken by the National Association of Regulatory Utility Commissioners (NARUC) with regard to the current process at the Commission concerning Intercarrier Compensation reform.

The Companies serve rural areas, with a large percentage of customers living in high-cost areas. Maine ILECs, including the Companies, have reduced their intrastate access rates to a level comparable to current interstate access rate levels. As a result, Maine has established a State Universal Service Fund to offset revenue losses associated with access charge reductions. In addition, Maine has established the ConnectME program which is designed to promote broadband buildout in rural areas. And yet, despite all of these state specific programs which are aiding the people of the State of Maine, it appears that Chairman Martin's plan is being rushed through in draft form. This plan may well treat Maine exactly the same as California and no one is being given an opportunity to formally review and comment on the document. There is a very real concern that the proposals in Chairman Martin's plan would undermine the positive steps taken by the Maine Commission and cause economic harm to rural customers in Maine.

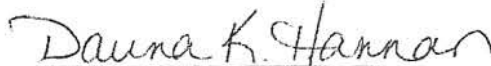
On October 21, 2008, NARUC filed an *ex parte* letter with the Commission in which they discussed in detail the potential difficulties associated with moving forward with the adoption of the plan currently being proposed by Chairman Martin. In this filing, NARUC suggested that the Commission not decide on a comprehensive Intercarrier Compensation scheme without adequate public notice and urged the Commission to rework any proposed Rule into the form of a Further Notice of Proposed Rulemaking and give parties at least 90 days to comment on this proposal. Similarly, in an *ex parte* filing made by the New England Conference of Public Utility Commissioners (NECPUC) on October 17, 2008, NECPUC requested that the Commission put any proposed Rule out for public comment prior to seeking its adoption. The Companies strongly support the efforts of NECPUC and NARUC and hope the Commission will proceed in a deliberate fashion and seek comment on any proposed Rules before adopting such Rules.

The one thing we must not forget throughout this entire process is that, at the end of the day, it must be good for the consumers. Right now, in the current economic environment, rushing into an unexamined and untested program that has the potential of raising the cost of essential utility services for customers in rural parts of the Nation does not seem like an appropriate risk to be taking. Accordingly, the Companies would respectfully request that the Commission follow the suggestions made in the October 21, 2008, NARUC filing in this proceeding and not adopt any comprehensive reform of Intercarrier Compensation without full public notice and opportunity to comment.

Respectfully Submitted,



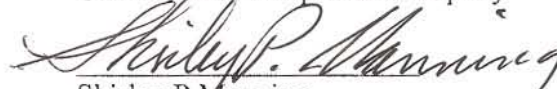
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